

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
15375 MEMORIAL CORPORATION, <i>et al.</i> ,)	Bankr. Case No. 06-10859 (KG)
)	
Debtors.)	(Jointly Administered)
)	
<hr/>		
BEPCO, L.P., f/k/a)	
Bass Enterprises Production Company)	
)	Civil Action No. 08-313 (SLR)
Appellant,)	
)	(Consolidation for procedural
v.)	purposes of Civil Actions 08-
)	313, 08-314, 08-318, 08-319, 08-
15375 MEMORIAL CORPORATION, <i>et al</i> ,)	321, 08-322, 08-325 & 08-326)
)	
Appellees and Cross-Appellants.)	Re: Docket Item 12
)	

**NOTICE OF FILING OF D. DEL. L.R. 7.1.1 STATEMENT RELATING TO
MOTION OF APPELLANT BEPCO, L.P., F/K/A BASS ENTERPRISES
PRODUCTION COMPANY FOR LEAVE TO FILE A REPLY IN SUPPORT OF
ITS EMERGENCY REQUEST FOR CERTIFICATION FOR DIRECT APPEAL
TO THE UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT**

Appellant BEPCO, L.P., f/k/a Bass Enterprises Production Company (“BEPCO”), hereby files this statement relating to the *Motion of Appellant BEPCO, L.P., f/k/a Bass Enterprises Production Company for Leave to File A Reply In Support Of Its Emergency Request For Certification For Direct Appeal To The United States Court Of Appeals For The Third Circuit* (D.I. 12) (the “Motion”) in accordance with Rule 7.1.1. of the Local Rules of Civil Practice and Procedure for the United States District Court for the District of Delaware:

1. The undersigned counsel for BEPCO hereby avers that it has made reasonable efforts to reach agreement with counsel for appellee/cross-appellants Santa Fe Minerals, Inc. (“Santa Fe” or “SFMI”) and 15375 Memorial Corporation (“Memorial,” and

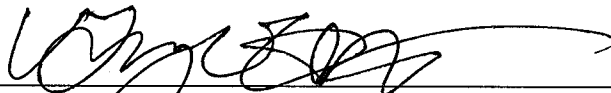
together with Santa Fe, the "Debtors") and GlobalSantaFe Corporation, GlobalSantaFe Corporate Services, Inc. and Entities Holdings, Inc. (collectively, the "GSF Entities") with respect to the Motion.

2. The Motion is procedural and relates to BEPCO's request to expedite its appeals and certify them for direct review by the United States Court of Appeals for the Third Circuit (D.I. 6) (the "Certification Request"). Given the expedited nature of the Certification Request, BEPCO filed the Motion (together with its proposed reply in support of the Certification Request) on Monday, June 16, 2008, the first business day after the Debtors and GSF Entities had filed their respective objections to the Certification Request (D.I. 9 & 10).

3. On Tuesday, June 17, 2008, BEPCO requested that the Debtors and GSF Entities consent to the Motion. Neither the Debtors nor the GSF Entities have responded to BEPCO's request to consent to the Motion.

Dated: Wilmington, Delaware
June 18, 2008

MORRIS, NICHOLS, ARSHT & TUNNELL LLP



Gregory W. Werkheiser (No. 3553)
Kelly M. Dawson (No. 4786)
1201 Market Street
P. O. Box 1347
Wilmington, Delaware 19899-1347
Telephone: (302) 351-9229
Fax: (302) 658-3989

-and-

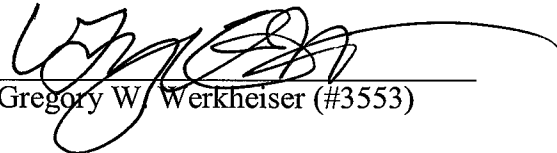
CARVER DARDEN KORETZKY TESSIER FINN
BLOSSMANN & AREAUX, L.L.C.
M. Hampton Carver (LA #4546)
Leann Opatowsky Moses (LA #19439)
1100 Poydras Street, Suite 2700
New Orleans, LA 70163
Telephone: (504) 585-3800
Fax: (504) 585-3801
Co-Counsel for BEPCO, L.P., formerly known
as Bass Enterprises Production Company

CERTIFICATE OF SERVICE

I, Gregory W. Werkheiser, certify that I am not less than 18 years of age, and that service of the **Notice Of Filing Of D. Del. L.R. 7.1.1 Statement Relating To Motion Of Appellant BEPCO, L.P., f/k/a Bass Enterprises Production Company For Leave To File A Reply In Support Of Its Emergency Request For Certification For Direct Appeal To The United States Court Of Appeals For The Third Circuit** was caused to be made on June 18, 2008, in the manner indicated upon the parties on the attached list.

Under penalty of perjury, I declare that the foregoing is true and correct.

Dated: June 18, 2008


Gregory W. Werkheiser (#3553)

SERVICE LIST

VIA E-MAIL and HAND DELIVERY

John D. Demmy, Esquire
Stevens & Lee, PC
1105 N. Market Street
7th Floor
Wilmington, DE 19801
jdd@stevenslee.com

Francis A. Monaco, Jr., Esquire
Kevin J. Mangan, Esquire
Womble, Carlyle, Sandridge & Rice, PLLC
222 Delaware Avenue, Suite 1501
Wilmington, DE 19801
fmonaco@wcsr.com
kmangan@wcsr.com

Noel C. Burnham, Esquire
Montgomery McCracken
1105 Market Street
Wilmington, DE 19801
nburnham@mmwr.com

David Buchbinder, Esquire
Office of the U.S. Trustee
844 King Street
Suite 2207
Lockbox 35
Wilmington, DE 19801
david.l.buchbinder@usdoj.gov

VIA E-MAIL and FIRST CLASS U.S. MAIL

Philip G. Eisenberg, Esquire
Mark A. Chavez, Esquire
Locke Liddell & Sapp, LLP
600 Travis Street
3400 JP Morgan Chase Tower
Houston, TX 77002
peisenberg@lockeliddell.com
mchavez@lockeliddell.com

John C. Kilgannon, Esquire
Stevens & Lee, PC
1818 Market Street
Philadelphia, PA 19103
jck@stevenslee.com

Natalie D. Ramsey, Esquire
Montgomery McCracken
123 South Broad Street
Philadelphia, PA 19109-1029
nramsey@mmwr.com

M. Hampton Carver, Esq.
Stephen Rose, Esq.
Leann Opatowsky Moses, Esq.
Carver Darden Koretzky Tessier Finn Blossman &
Areaux, L.L.C.
1100 Poydras Street - Suite 3100
New Orleans, LA 70163
carver@carverdarden.com
rose@carverdarden.com
moses@carverdarden.com